

# **EXHIBIT C**

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11 Attorneys for Plaintiff

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 MICK ROCK, an individual,

Case No.:

15 Plaintiff,

**NOTICE OF RELATED CASE**

16 v.

17 ENFANTS RICHES DEPRIMES, LLC, et  
18 al.,

19 Defendants.  
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1 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR  
2 ATTORNEYS OF RECORD:

3 Plaintiff, Mick Rock hereby files this Notice of Related Case pursuant to  
4 Federal Rule of Civil Procedure 83 and C.D. Cal. R. 83-1.3.1. The claims at issue in  
5 the instant case bear relation to the following action assigned to the Honorable  
6 Andrew L. Carter, Jr, *Rock v. Enfants Riches Deprimes, LLC et al.* Case No. 1:17-cv-  
7 02618-ALC-DCF (“NY Action”).

8 Specifically, the instant action and the NY Action both allege that Defendant  
9 Infant Riches Deprimes, LLC has infringed Plaintiff’s copyrights in the same  
10 photograph owned by Mick Rock, and both actions allege that the infringement  
11 occurred when Infant Riches Deprimes, LLC created, sold, manufactured, caused to  
12 be manufactured, imported and/or distributed product bearing images which are  
13 substantially similar if not identical to the Mick Rock’s photograph at issue here.  
14

15 Local Rule 83-1.3.1 outlines four factors to be considered in determining  
16 whether to deem cases related:

17 If the cases appear:

- 18 (a) To arise from the same or a closely related transaction, happening  
19 or event; or  
20 (b) To call for determination of the same or substantially related or  
21 similar questions of law and fact; or  
22 (c) For other reasons would entail substantial duplication of labor if  
23 heard by different judges.  
24 (d) To involve the same patent, trademark or copyright, and one of the  
25 factors identified above in a, b or c is present

26 C.D. Cal. R. 83-1.3.1(a)-(c).

27 Here, sections (a), (b), and (d) are applicable: (a) both actions concern the same  
28 defendant’s access to and alleged infringement of the same photograph owned by  
Plaintiff, (b) factual questions relating to this access to, and the infringing use of,

Plaintiff's works are the same, and the legal determinations of copyrighted infringement, and damages thereof are the same, and (d) the involvement of the copyrighted work is the same.

Given the foregoing, Plaintiff respectfully requests that this instant action be deemed related to the NY Action.

Respectfully submitted,

Dated: March 5, 2020

By: /s/ David Shein  
Stephen M. Doniger, Esq.  
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Attorneys for Plaintiff